

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALEXANDER McGRAIL REYNOLDS,

Defendant.

**Affirmation in Support of
Application for Order of
Continuance**

24 Mag. 2910

State of New York)
County of New York : ss.:
Southern District of New York)

Andrew Jones, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A).

2. The defendant was charged in a complaint dated August 9, 2024, with violations of 18 U.S.C. § 922. The defendant was arrested on August 13, 2024 and made an appearance in the Northern District of California that same date. On August 22, 2024, and was presented in this District before Magistrate Judge Ona T. Wang by video on that same date, at which proceeding the defendant was represented by Ariel Werner, Esq., and ordered released on bail with certain conditions.

3. At the presentment on August 22, 2024, a preliminary hearing was scheduled for September 23, 2024. Under the Speedy Trial Act, the Government had until September 23, 2024

within which to file an indictment or information. *See* 18 U.S.C. § 3161(b). That date has been further extended by Court order to November 25, 2024.

5. Defense counsel and I have had discussions regarding a possible disposition of this case. In addition, the Government has produced certain discovery materials to assist those ongoing discussions. Defense counsel's review of the discovery materials has not been completed and is not anticipated to be completed before November 25, 2024. The parties plan to continue our discussions, but do not anticipate a resolution before November 25, 2024.

6. Therefore, the Government requests a 30-day continuance until December 26, 2024, to continue the foregoing discussions toward resolving this matter. I personally corresponded with defense counsel, who stated that the defendant consents to an extension of the preliminary hearing and Speedy Trial Act deadlines to December 26, 2024, and has specifically consented to this request.

7. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
November 18, 2024


Andrew Jones
Assistant United States Attorney
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